# **MOBILE URBAN COUNTY**

# CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

**JULY 1, 2019 – JUNE 30, 2020** 



Mobile County Commission Post Office Box 1443 Mobile, Alabama 36633

#### CR-05 - Goals and Outcomes

# Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The PY2019 Consolidated Annual Performance and Evaluation Report (CAPER), covers the fifth year of the Mobile Urban County Consolidated Plan, a five-year planning document that is necessary for applying and being funded under the U.S. Department of Housing and Urban Development (HUD) formula grant programs. The Mobile Urban County (Urban County) represents all the unincorporated portions of Mobile County, and the cities of Bayou La Batre, Chickasaw, Creola, Citronelle, Mount Vernon, Prichard, Saraland, Semmes, and Satsuma. Mobile County Commission (Mobile County) is the designated lead agency for the Urban County Program and as such, holds the responsibility for the design and development of the various programs, activities and projects identified in the five year consolidated plan. The two programs, for which Urban County was an entitlement grantee in 2019, were the Community Development Block Grant (CDBG) program, and the HOME program. The Urban County did not receive Emergency Solutions Grants (ESG) in PY19.

In 2019, the Urban County made progress in addressing goals and objectives set forth in the Consolidated Plan. All planned activities reflect priorities established within the approved 2015-2019 Consolidated Plan. For PY2019, the County received \$1,518,243 and with prior year funds of \$16,188 had a total of \$1,534,431 in CDBG funds and \$536,837 in HOME funds.

In PY2019, the County completed the following CDBG-funded project (note projects completed may have started in previous PY years):Demolition and clearance of tweleve properties, one Drainage improvements, one road-improvement, rehabilitation of a recreational facility to be ADA compliant, Rehab of a group home for mentally disabled adults, improvements to a park and upgrade of a parking lot. Projects that are in progress will be reported in future CAPERs. In 2019, CDBG-funded public service projects included the following: senior services, feeding program for seniors, prescription drug assistance, Homebuyer housing counseling, domestic violence victim advocacy, homeless prevention legal assistance, transportation services, youth development summer program and child abuse victim assistance.

With HOME funds, one affordable homeowner housing was developed and sold by a CHDO, increasing the stock of affordable housing in the Urban County. Homeownership further increased by five households with the assistance of the Downpayment Assistance program. A rental development with 64 units of which 5 are HOME assisted was completed in PY19. This development was in conjunction with the Low Income Housing Tax Credit funds.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source /	Indicator	Unit of	Expected	Actual –	Percent	Expected	Actual -	Percent
		Amount		Measure	1	Strategic	Complete	ı	Program	Complete
					Strategic Plan	Plan		Program Year	Year	
CDBG and HOME Administration	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$ / HOME: \$	Other	Other	1	1	100.00%	н	П	100.00%
Economic Development	Economic Development	CDBG: \$	Other	Other	ᠳ	0	0.00%	·		
Homeless Programs and Services	Homeless	ESG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	09	21	35.00%			
Homeless Programs and Services	Homeless	ESG: \$	Homeless Person Overnight Shelter	Persons Assisted	100	41	41.00%			
Homeless Programs and Services	Homeless	ESG: \$	Homelessness Prevention	Persons Assisted	18	51	283.33%	·		

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100.00%	100.00%	103.15%	126.53%		96.55%
H	N	24662	1345	0	84
<del>, , ,</del>	r.	23908	1063	0	87
275.00%	88.00%	119.76%	89.32%		96.55%
11	22	143156	5058	0	84
4	25	119540	5663	0	87
Household Housing Unit	Households Assisted	Persons Assisted	Persons Assisted	Persons Assisted	Persons Assisted
Homeowner Housing Added	Direct Financial Assistance to Homebuyers	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Public service activities other than Low/Moderate Income Housing Benefit	Homeless Person Overnight Shelter	Homelessness Prevention
CDBG: \$ / HOME:	CDBG: \$ / HOME:	CDBG: \$	CDBG: \$	CDBG: \$	CDBG: \$
Affordable Housing	Affordable Housing	Homeless Non-Housing Community Development	Non-Homeless Special Needs Non-Housing Community Development	Non-Homeless Special Needs Non-Housing Community Development	Non-Homeless Special Needs Non-Housing Community Development
Homeowner Housing	Homeowner Housing	Public Facilities and Infrastructure	Public Services	Public Services	Public Services

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120.00%			75.00%
9		0	12
ī.		0	16
280.00%	0.00%		52.50%
28	0	0	21
10	7	0	40
Household Housing Unit	Household Housing Unit	Household Housing Unit	Buildings
Rental units constructed	Rental units rehabilitated	Homeowner Housing Added	Buildings Demolished
CDBG: \$ / HOME:	CDBG: \$ / HOME:	CDBG: \$ / HOME:	¢:\$
Affordable Housing	Affordable Housing	Affordable Housing	Non-Housing Community Development
Rental Housing	Rental Housing	Rental Housing	Spot Blight Clearance

Table 1 - Accomplishments - Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

All funded activities were consistent with the priorities established in the five-year 2015-2019 Consolidated Plan and the specific objectives included in the 2019 Action Plan.

services. Accomplishements for all line items have or are in the process exceeding the estimated amount. Spot Blight clearance activities that CDBG priorities addressed in the 2019 Action Plan include: public facilities, infrastructure, infrastructure (culverts and drainage) and public were delayed in PY16 due to issues with determining legal ownership got underway in PY19 with 12 units demolished..

development, by a CHDO, of a 56-unit affordable senior rental housing is in the prelimaniary stage. The development will leverage HOME funds HOME priorities addressed in the 2019 Action Plan included the development of rental units by a CHDO. At the time of this report, the with Tax Credit and private equity.

# CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

	CDBG	HOME	ESG
White	2	2	0
Black or African American	23	10	0
Asian	1	0	0
American Indian or American Native	1	0	0
Native Hawaiian or Other Pacific Islander	0	0	0
Total	27	12	0
Hispanic	0	0	0
Not Hispanic	0	0	0

Table 2 – Table of assistance to racial and ethnic populations by source of funds

#### Narrative

In terms of persons assisted with CDBG for non-housing needs were:

White	3,	,261
Black/African American	1	,166
Asian		26
American Indian/Alaskan N	Native	60
Native Hawaiin/Other Paci	iific Islander	6
Amer. Indian/Alaskan Nati	ve & White	6
Black/African American &\	White	13
Amer. Indian/Alaskan Nati	ve & Black/African Amer	8
Hispanic		<b>75</b> .
Extremely low (<=30%)	282 persons	103 r non-housing needs were:
Low (>30% and <=50%)	1,819 persons	

160 persons

Total beneficiaries assisted 2,261 persons

Mod(>50% and <=80%)

# CR-15 - Resources and Investments 91.520(a)

#### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	3,028,849	1,802,792
HOME	public - federal	2,238,229	1,147,481
ESG	public - federal	0	0

Table 3 - Resources Made Available

#### Narrative

For CDBG and HOME, resources made available reflect 2019 award allocations, program income, recaptured funds and funds from previous PY. The amount expended during program year includes projects with multi-year funding.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
CDBG Area			Areas eligible for CDBG Program area
Benefit	53	47	benefit.
			Non-CDBG area benefit to account for
Countywide	47	53	individual benefit programs.

Table 4 - Identify the geographic distribution and location of investments

#### **Narrative**

The planned percentage of allocation and the actual percentage of allocation are projected to be on target. Some PY19 projects are still on going, however funds allocated are in line with projected allocation. Percentage of allocation are was based on federal funding requirements for each formula-allocated grant (PY19). Areas of low to moderate-income concentration were targeted.

#### Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

The Urban County has utilized CDBG to leverage additional public and private funds. The two primary sources of public funds used to leverage CDBG funds are County general fund and Capital Improvement Plan. Also, some support staff salaries of the Urban County necessary to implement CDBG projects are funded by the general fund. In addition, Urban County members have contributed funds to expand and supplement CDBG funded projects. Other forms of leveraging within the CDBG program is donated land owned by Urban County members. The County's use of HOME funds has been successful in leveraging mortgage funds from private lenders (banks, mortgage companies, and other lending institutions) for individual mortgages by providing the down payment and paying closing costs. The County provided HOME funds to a not-for-profit to construct one affordable for sale housing unit. That organization is leveraging HOME funds with donated land, materials, equipment, cash and in-kind labor.

One of the requirements for participating in the HOME program is that the local government provide a match equal to 25 percent of the 2019 Federal fiscal year amount allocated from HOME funds. No match funds are required for projects funded by program income. The HOME funds match requirement is satisfied in the form of cash and in-kind contributions. When the total revenue match is larger than the required match expense, the difference is accumulated for later match by the HOME program. In-kind match is contributed from the accumulated match, when HOME funds are drawn.

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Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	23,652
2. Match contributed during current Federal fiscal year	52,889
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	76,541
4. Match liability for current Federal fiscal year	75,517
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	1,024

Table 5 - Fiscal Year Summary - HOME Match Report

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			Match Contribu	Match Contribution for the Federal Fiscal Year	eral Fiscal Year			
Project No. or	Date of	Cash	Foregone	Appraised	Required	Site	Bond	Total Match
Other ID	Contribution	(non-Federal sources)	Taxes, Fees, Charges	Land/Real Property	Infrastructure	Preparation, Construction	Financing	
						Materials, Donated labor		
428	03/11/2019	0	0	0	0	2,335	0	2,335
430	03/11/2019	0	0	0	0	2,565	0	2,565
602	03/11/2019	0	0	0	0	1,500	0	1,500
603	03/18/2019	0	38,489	0	0	0	0	38,489
673	04/03/2019	0	0	8,000	0	0	0	8,000

Table 6 - Match Contribution for the Federal Fiscal Year

# HOME MBE/WBE report

	or Balance on hand at end of reporting period	0 834,397
	Amount expended for TBRA	
ts for the reporting period	Total amount expended during reporting period	77,702
program amounts for the rep	Amount received during reporting period	564,907
Program Income - Enter the program amount	Balance on hand at begin- ning of reporting period \$	347,192

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period

	Total	Minority Business Enterprises			White Non-	
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic
Contracts						·
Dollar						
Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
Sub-Contract	S			<u> </u>		· · · · · ·
Number	0	0	0	. 0	0	0
Dollar						
Amount	0	0	0	o	0	0
	Total	Women	Male		· <del>-</del>	

	Total	Women Business Enterprises	Male
Contracts			
Dollar			
Amount	0	0	0
Number	0	0	0
Sub-Contract:	5		
Number	0	0	0
Dollar			
Amount	0	0	0

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted

	Total		White Non-			
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic
Number	0	0	. 0	0	0	0
Dollar				-		<del></del>
Amount	0	0	0	О	0	0

Table 9 - Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition

Parcels Acquired	0	0
Businesses Displaced	0	0
Nonprofit Organizations		
Displaced	0	0
Households Temporarily	·	
Relocated, not Displaced	0	0

Households	Total		Minority Prope	rty Enterprises		White Non-
Displaced		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	C

Table 10 - Relocation and Real Property Acquisition

# CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be		
provided affordable housing units	o	0
Number of Non-Homeless households to be		
provided affordable housing units	10	12
Number of Special-Needs households to be		
provided affordable housing units	0	0
Total	10	12

Table 11 - Number of Households

	One-Year Goal	Actual
Number of households supported through		
Rental Assistance	0	0
Number of households supported through		
The Production of New Units	5 .	. 7
Number of households supported through		
Rehab of Existing Units	0	0
Number of households supported through		
Acquisition of Existing Units	5	5
Total	10	12

Table 12 - Number of Households Supported

# Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The number of households supported through the production of new units and acquisition of existing units are derived from projects using funds made available from the action plan's one-year goals. Sometimes these type of projects can take multiple years; therefore the outcomes in the program year CAPER do not always correspond with the respective action plans.

In PY19, one home was constructed and sold by a CHDO, five homebuyer were assisted in purchasing exhisting homes and six households moved into a sixty-four newly constructed rental units of which six were HOME assisted units. In total twelve households were supported with HOME funds.

Mobile County currently has provided a provisional award to a CHDO developer for the production of rental housing unit. This development is in conjuction with a tax credit deal. Prelimainary production details are in progress.

#### Discuss how these outcomes will impact future annual action plans.

The number of households supported through the production of new units and acquisition of existing units are derived from projects using funds made available from the action plan's one-year goals. Sometimes these type projects can take multiple years; therefore the outcomes in the CAPER may be from projects in prior year action plans. Future outcomes will be reflective of projects that are completed during the program year.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	1
Low-income	0	5
Moderate-income	27	6
Total	27	12

Table 13 - Number of Households Served

#### **Narrative Information**

For CDBG, 2 household were in the 51%-60% income range and 25 were in the income range of 61%-80% AMI. During PY19 most activites did not require information on income by family size, however projects were either in low-moderate income areas or served limited clientel.

For HOME, Rental Households assisted with HOME funds by income category were:

30% Limits (<=30%) 1 Household Very Low (>31% and <=50%) 5 Households

Homeowner households assisted with HOME funds by income category were

60% Limits (>51% and 60%) 2 Households

Low (>61% and <=80%) 4 Households

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c) Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The County did not receive ESG funding, however CDBG funds to prevent or end homelessness was provided to an agency that agency assisted 106 persons.

The Continuum of Care conducted annual surveys of homeless individuals, including unsheltered persons. The surveys served to help focus local homeless agency activities as well as provide documentation in response to HUD program requirements.

# Addressing the emergency shelter and transitional housing needs of homeless persons

Homeless prevention is a major focus of the participants in the Continuum of Care. Agencies include homeless prevention as a support program in conjunction with the provision of shelter and other support services. Additionally, homeless individuals being discharged from publicly funded institutions and systems of care are being directed to the local Coordinated Assessment System for assistance.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The County provided CDBG funds for homeless prevention legal service activities

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Despite not receiving ESG for PY17, PY18 and PY19, the County appropriated local funds to various agencies including mental health providers, legal services, social services who in turn provide services to those being discharged from public funded institutions.

# CR-30 - Public Housing 91.220(h); 91.320(j)

#### Actions taken to address the needs of public housing

The Mobile Housing Board (MHB) has been approved under the Rental Assistance Demonstration (RAD) program. RAD is a voluntary program authorized by the U.S. Congress and run by the U.S. Department of Housing and Urban Development (HUD) which allows selected public housing authorities the opportunity to leverage public and private equity and to convert public housing units to project-based voucher units. The Section 8 voucher funding stream from HUD has been more stable over time. This means MHB can preserve the long-term affordability of its subsidized units without increasing the rental cost to MHB residents.

RAD provides the ability to reposition traditional public housing developments into mixed income communities, moving these outdated developments from areas of isolation to modern and thriving rental development of choice. Cottage Hill Place is the first of the RAD and Lower Income Housing Tax Credit Developments in Mobile County with development and construction underway.

The County has waived property tax for the Cottage Hill Place development in order to provide a long term viable project that will keep rents affordable for the tenants.

# Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

The County provides equal opportunites to public housing residents to participate in credit counseling with the goal of becoming a future homeowners. The County has formed partnerships with nonprofit organizations to increase Fair Housing activities that public housing residents wish to undertake. These classes can become a springboard for residents to attend credit counseling if bad credit prevents from securing a mortgage. All public housing residents have equal opportunity to benefit from housing assistance as well as public services.

#### Actions taken to provide assistance to troubled PHAs

The Urban County has no troubled PHAs.

# CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

Mobile County has very limited barriers to the production of affordable housing and residential investment in terms of potential public policies that can impact affordable housing. Specifically, use of 2018 building codes does add costs to development, but the location of Mobile County along Alabama's GulfCoast presents unique weather related challenges (i.e., hurricanes, high winds, high volume rainfall events, etc...) that must be taken into consideration, as the costs of insuring and rebuilding are excessively high without such measures. As far as land use restrictions, the County does not have a zoning ordinance; however, there is a subdivision regulation that applies to the subdividing of land for development within the rural portion of the county. With respect to taxes, the millage rates for Mobile County are among the lowest in the nation. Mobile County currently has a rate of 48.5, which is the lower than all incorporated municipalities within the County as well as many other locations within the State of Alabama, which has the second to the lowest rates in the US. While there are no specific public policy barriers identified herein, the Action Plan does have various elements in place to help supply and encourage Affordable Housing. Specifically, down payment assistance, payment of closing costs, and mortgage assistance remove an economic barrier to affordable homeownership. Over the five year period, the County will continue to provide funds to assist with the construction of rental and homeowner housing, which contributes directly to the supply of affordable housing. In addition, the construction or rehabilitation of public infrastructure will indirectly facilitate the development of various residential building sites without adding significantly to the development costs that are passed on to homebuyers. As for direct assistance to households, the County provided homebuyer counseling through its CDBG program to help them understand the processes and responsibilities of homeownership. Under a separate program, the County used HOME funds to provide assistance to qualified low- and moderate-income homebuyers for down payments and eligible closing costs of self selected housing. The County also used HOME funds to provide mortgage assistance to homebuyers who purchased homes constructed with County HOME funds.

# Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

Other actions taken by Mobile County to address the Community Development needs identified in the Consolidated Plan include participation in other categorical and formula grants from federal and state funding sources other than HUD that offer opportunities to channel resources toward specific problem areas that impede the quality of life for its residents. These actions have a positive impact on improving the livability of the county for all its residents. These actions, however, positively impact particularly those issues (i.e., crime, drug abuse, child abuse, violence, etc.) that have a disproportionate negative impact on low/moderate-income residents.

The following is a list of some of the other actions taken:

<u>Juvenile Justice Programs award by Alabama Department of Youth Services</u> These programs are awarded by the Alabama Department of Youth Services to provide services for boys and girls referred by juvenile courts as an alternative to local Department of Youth Services, including a comprehensive aftercare model which includes many necessary components identified to successfully reintegrate youth into the community exiting the alternative to incarceration.

<u>Crime Victim Assistance</u> These funds are for the Child Advocacy Center to provide direct services, including counseling, forensic medical exams, legal services, free transportation and court preparation, for child victims of sexual or severe physical abuse and their non-offending family members.

<u>Violence Against Women Formula Grants</u> These funds are used to help the Mobile County District Attorney's Office lead a coordinated community response to domestic violence. The funds will also allow the District Attorney to facilitate and conduct domestic violence training.

<u>Justice Assistance Grant</u> The JAG Program provides units of local government (including Mobile County, City of Prichard and City of Mobile) with funds to underwrite locally identified projects to help reduce crime and improve public safety.

<u>Highway Traffic Safety</u> Provides funds for a community-based program that coordinates a multi-faceted, multi-agency, public/private response to the complex highway traffic safety problems in Mobile and Baldwin Counties; this program is responsible for the enforcement of Alabama's traffic laws and education/awareness campaigns relating to traffic safety.

<u>Corporation for National and Community Service</u> The grant provides assistance in funding the Foster Grandparent, Senior Companion and the Retired and Senior Volunteer Program. These programs provide reimbursement expenses for volunteers over the age of 55 that perform duties as senior companions, foster grandparents to children and retired volunteers throughout the community.

Requests for Letters of Consistency are reviewed and provided, as appropriate, for projects seeking federal funding as long as they are consistent with the County's five-year Consolidated Plan. There has been no hindrance of the Consolidated Plan through action or willful inaction.

## Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

In order to address the hazards of lead based paint, the County requires that a lead evaluation be done on any dwelling unit that received HUD HOME funding. A visual assessment of the unit is conducted to identify any deteriorated paint, dust, debris and residue so that these conditions can be corrected prior to closing. The visual assessment must be done by qualified personnel. Accordingly, the County contracts with a state licensed Home Inspection and HUD/FHA/VA/Compliance Fee Inspection Company to perform such inspections. The property owner is responsible for correcting any conditions identified

in the visual assessment. All deteriorated paint must be stabilized by properly trained or supervised workers using lead safe work practices. Information on the hazards of lead-based paint are covered through the Consumer Credit Counseling's Homebuyer Training Program and brochures are made available to all potential DPA homebuyers. Eligible homebuyers also receive the Lead Hazard Information Pamphlet, Lead Disclosure Notice, and the Notice of Lead Reduction, as required by HUD.

# Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The County strives to foster and maintain affordable housing, as has been described elsewhere in this document, and has been mindful of opportunities to positively impact the lives of low-income persons and reduce the number of poverty level households in the community. During PY2019, the County committed CDBG funds to public service organizations to provide prescription drug assistance and to provide legal services for a homelessness prevention project.

Specific project elements undertaken during 2019 effectively serve to reduce the number of poverty level families through activities funded with CDBG and HOME funds. Over the years the County has worked with nonprofit organizations to identify qualified low-income households to participate in the down payment assistance program for homebuyers. Becoming a homeowner enables some low-income households (who have previously carried an excessive housing cost burden) to realize an increase in disposable income thus raising the quality of life for those households. Construction of affordable rental housing also enables those families/ households living below poverty (complicated by excessive housing cost burden) to realize an increase in disposable income. While no specific studies have been undertaken regarding this matter, it is reasonable to assume that reduced housing burden would raise some families above the poverty level. Further, infrastructure improvements typically create entry-level construction jobs that provide an economic stimulus and benefits for low- and moderate-incomefamilies. The County has focused on the elimination of homelessness and the impact of supportive services to low-income households to reduce the number of persons living in poverty.

# Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The County continued to seek roundtable discussion meetings with other governmental groups or agencies, financial institutions, public housing agencies and private and nonprofit agencies with similar interests and missions. These meetings enable organizations that share common goals a venue to exchange information.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

CAPER

The County continued to participate in meetings with public and private housing and social service agencies in an effort to enhance coordination between these agencies in the community.

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# Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The County continues its efforts in addressing one of the leading impediments to housing affordability (lack of income), as identified in An Analysis of Impediments to Fair Housing, through the County-sponsored down payment and mortgage assistance programs. The County also continues efforts to increase the availability of affordable homes through HOME assisted construction projects. The County works with local banks, developers and non-profit organizations to expand the stock of affordable housing. The County is assisting affordable housing developers who have received County HOME funds by providing a link to affordable housing units via the County's website.

The County has contracted with Family Counseling Center of Mobile/Consumer Credit Counseling Service of Mobile, over the years through the use of CDBG public service funds, to provide housing and financial counseling services. These services are designed to equip clients with the tools and knowledge they need to improve their economic standing or to assist in maintaining current housing. By improving money management skills, low income clientele are better able to make informed decisions, which can lead to family stability and becoming self-sufficient. By improving credit scores, clients can reduce the amount of monthly expenses for loan payments and insurance, have access to mainstream financial products and services and lessen their reliance upon alternative financial services such as payday/title loans and check cashing services. In turn, this leads to opportunities to apply for better paying jobs that use credit scores in hiring decisions. This can result in adequate income for housing choice, either for rental or homeownership, which includes improved mobility. The ultimate goal is to address disparities in access to opportunity and housing needs.

The County Commission adopted The American with Disabilities Act (ADA) Transition Plan for Mobile County and has plans to mitigate identified barriers with CDBG funds as well as other resources. With respect to privately developed housing, developers are required to comply with ADA in multi-family rental properties and to make reasonable accommodations as may be required to facilitate access by a person with disabilities.

## CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The Mobile County Grants Department uses two basic methods for monitoring grant funded projects for compliance with program rules and performance. The two methods are (1) off-site or "desk" monitoring, and (2) on-site monitoring. A "Risk Analysis" is conducted to determine how the monitoring will be done throughout the year. The results obtained from the risk analysis objectively determine which method is to be implemented. The Grants Department performs on-site monitoring and/or technical assistance when determined necessary. The County conducts an annual review of each down payment and mortgage assistance participating household to secure evidence of the purchasing household's continued occupancy. The review occurs at twelve-month intervals beginning 12 months from the original date of occupancy. The County conducts annual financial monitoring of rental properties. Site monitoring of rental developments is based upon the schedule in §92.504(d). Unit inspections are performed and tenant files are reviewed for compliance with HOME program requirements.

The Grant Department's objectives in monitoring grant funded projects are to document compliance with program rules; track program/project performance; ensure timely expenditure of grant funds and timely closeout of projects; and identify technical assistance needs. The Engineering Department, the Facilities Department and Grants Department are responsible for the majority of oversight/monitoring during construction of public facilities and public works/infrastructure projects. A periodic review is made of each grant to ensure the timeliness of expenditure and also that the goals and objectives are in compliance with the Consolidated Plan and Action Plan. All subrecipients are regularly monitored through draw requests for regulatory and statutory compliance. The County continually monitors program results to ensure program design leads to maximizing benefits. The County monitors all funds obligated and spent, whether spent directly, through a contract or subrecipient agreement to ensure compliance with the federal regulations. The County provides technical assistance for newly funded projects through orientation meetings, on-site visits, and by telephone.

Language in County agreements requires subrecipients to reach out to minority and women owned businesses. Most procurement for services or construction contracts includes language encouraging minority and women business enterprises to apply. When appropriate, advertisements are published or broadcast through minority targeted media.

Mobile County Commission as the lead of the Mobile Urban County oversees the development of the Consolidated Plan and the Annual Action Plans and the implementation of projects funded through Action Plans. The Commission, through the Grants Department, has responsibility for ensuring compliance with program and comprehensive planning requirements. The Urban County follows a

project selection procedure that requires proposals from member jurisdictions and other public and private agencies to be submitted. Following an eligibility determination by the Grants Department, a Project Review Committee examines proposals for feasibility, cost effectiveness, and benefit. The Committee ultimately develops and provides a non-binding budget for each formula grant program to the County Commission. The County Commission has the ultimate authority to approve projects and the budget.

#### Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

Due to the COVID19 panadamic, HUD provided a waiver to extend submission of the CAPER from 90 days from the end of the program year to 180 days of the program year. Mobile Urban County's program year ended on June 30, 2020. Submission of the PY19CAPER will be made on Monday, December 28th, 2020. On December 7, 2020, the County published an advertisement in the Press Register to notify the public of the availability of the Consolidated Annual Performance and Evaluation Report (CAPER), the minimum of 15-day public comment period and the public hearing date of December 23rd, 2020. The minimum of 15-day comment period started December 7th, 2020 and ended on December 23, 2020. Copies of the CAPER were available at the offices of Mobile County Commission, on the County's website at www.mobilecountyal.gov and upon request. Comments or suggestions concerning this CAPER were to be made orally at the public hearing or/and in writing and mailed to Mr. Glenn Hodge, County Administrator, Mobile County Commission, P. O. Box 1443, Mobile, AL 36633.

## CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

In PY19, the County adopted 1 substantial amendment and two minor amendments. Program changes were made due to the deletion of a slow moving project in favor of on-going projects and reprogramming of remaing funds of completed projects. The amendmends were not for PY19 projects.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

## CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Due to COVID19, HUD has provided a waiver for the requirement of physical inspection. However, except for one property all properties were or will be inspected by the end of December 2020.

On-site inspections conducted during November – December 2020 were for the following affordable rental housing units:

- Arbours at Pierce Creek consists of 5 HOME rental units designated for seniors. On-site
  inspection was carried out on November 19, 2020. The HOME units were not inspected due to
  owner concerns over COVID-19.
- Baytown Senior Village consists of 6 HOME rental units: Property inspection was carried out on November 3, 2020. The inspection revealed no issues with the physical condition of the property.
- 3. The Gardens at Wellington consists of 4 HOME rental units designated for seniors. Property inspection was carried out on December 3, 2020. The inspection revealed no issues with the physical condition of the property.
- 4. Eagles Landing consists of 19 transitional HOME rental units for veterans. Property inspection was carried out on December 14, 2020.
- 5. MoWa Choctaw Homes consists of 4 rental homes: Property inspection was carried out on December 1, 2020.
- 6. Pelican Landing Apartments consists of 7 HOME rental units designated for seniors. The inspection was carried out on December 9, 2020.

Owners of all properties certify that each building and all HOME-assisted units in their project are suitable for occupancy in their annual report narrative.

# Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

As a recipient of federal funds, Mobile County has adopted affirmative marketing procedures and requirements for rental and homebuyer projects containing five or more HOME-assisted housing units. Affirmative marketing steps consist of actions that provide information and otherwise attract eligible persons in the housing market area to the available housing without regard to race, color, national or ethnic origin, age, religion, disability, sex, sexual orientation, gender identity and expression, veteran status, characteristics of personal identity, or any other characteristic protected under applicable federal or state law. Mobile County requires developers, projects, and programs using HUD funds to affirmatively market its housing programs to ensure that eligible households have ample access and opportunity to participate in programs and services that use federal funds. Marketing efforts in PY 2019 were conducted through various HOME projects and programs using federal funds. Advertisements were sent to minority development agencies to notify minority and women owned businesses of contracting opportunities available. In addition, the County's web site continues to play a vital role in targeting information to the public and ensuring program information reaches a broad audience.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

\$47,846.68 of program income was drawn for Downpayment Assistance for the benefit of 5 first-time homebuyers. Program income Administration set-aside of \$29,855.11 was drawn for program administration cost.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

N/A